

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

IN RE:)	
)	
MELISSA GAIL NAPIER)	CASE NO: 3:19-bk-00703
)	CHAPTER 13
Debtor.)	JUDGE CHARLES M. WALKER

**DEBTOR'S OBJECTION TO TRUSTEE'S MOTION TO DISALLOW CLAIM
OF U.S. BANK TRUST, N.A. (PAYEE BSI FINANCIAL SERVICES) (COURT CLAIM 16) AND
MOTION FOR DETERMINATION OF PREPETITION ARREARS AND
ONGOING MORTGAGE PAYMENT**

Comes now the Debtor, by and through counsel, and objects to the *Trustee's Motion to Disallow Claim of U.S. Bank Trust, N.A. (Payee BSI Financial Services) (Court Claim 16) and Motion for Determination of Prepetition Arrears and Ongoing Mortgage Payment* [Court Docket No. 32]. Response deadline is July 5, 2019 and hearing date is July 15, 2019. In support of this response, Debtor would show the following:

1. Debtor filed for Chapter 13 bankruptcy on February 5, 2019.
2. Debtor's Chapter 13 plan was confirmed on May 23, 2019.
3. U.S. Bank Trust, N.A. (Payee BSI Financial Services) filed a timely proof of claim on April 16, 2019.
4. Debtor's counsel objects to the determination of the ongoing mortgage payment in the amount of \$507.51.
5. Debtor does not object to the disallowance of the prepetition arrears.
6. Debtor's counsel respectfully requests time to review the allegations contained in the Trustee's Motion and address this issue with Creditor.

WHEREFORE the Debtor respectfully requests the matter be set for hearing.

Dated on July 5, 2019.

Respectfully submitted,

/s/Alise Housden

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